

Catherine Turner

Attorney at Law

P.O. Box 19607, Minneapolis, MN 55419

Phone: 612-361-4895

Fax: 866-663-4338

catherine@catherineturnerlaw.com

Via ECF and Email (schultz_chambers@mnd.uscourts.gov)

The Honorable David T. Schultz

Magistrate Judge

United States District Court

300 South Fourth Street

Minneapolis, MN 55415

Re: *United States v. Anton Lazzaro*

Minnesota District Court file 0:21-cr-00173(1) (PJS/DTS)

Dear Magistrate Judge Schultz:

As counsel for Mr. Lazzaro, we write regarding our pending motion to vacate restraints on certain seized property. (Docs. 74-75, filed 10/28/21).

On November 2, 2021, Your Honor filed a Briefing Order/Notice of Hearing. (Doc. 77). The Order required the government to respond to the motion by November 23, 2021, with any reply by Mr. Lazzaro to be filed today.

The government has not filed any response to the motion, nor has it contacted counsel regarding this matter. Accordingly, we submit herewith a proposed order granting the motion without opposition. We respectfully request that Your Honor inform the parties whether, in light of the above, the hearing scheduled for December 15 will be necessary.

Respectfully submitted,

/s/ Catherine Turner

Catherine Turner
MN Attorney No. 0349057
P.O. Box 19607
Minneapolis, MN 55419
(612) 361-4895
(866) 663-4338 fax

Steven L. Kessler, *pro hac vice*
LAW OFFICES OF STEVEN L. KESSLER
P.O. Box 100, Wykagyl Station
New Rochelle, New York 10804
(212) 661-1500

Attorneys for Defendant Anton Lazzaro

Encl.

cc: All counsel (*by ECF*)